

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously)	
)	
Plaintiff,)	
)	
vs.)	Case No. 5:25-cv-00462-G
)	
PLAZA HOTELS, LLC; STEVE)	
KETTER; MICHAEL WILEY; OKC)	
AIRPORT ES, LLC; ESH STRATEGIES)	
FRANCHISE, LLC; KAJAL)	
HOSPITALITY, INC; JALIYAN)	
HOSPITALITY, INC; SUPER 8)	
WORLDWIDE, INC; RAJ KRUPA)	
HOTEL, LLC; DAYS INNS)	
WORLDWIDE, INC; CHAND & SAAJ)	
HOSPITALITY, INC; RAMADA)	
WORLDWIDE, INC; YASH)	
ENTERPRISES, INC; HOWARD)	
JOHNSON INTERNATIONAL, INC;)	
NOOR HOTEL, LLC; AMBICA, LLC;)	
OM, LLC; INDRA, LLC; AND G6)	
HOSPITALITY FRANCHISING, LLC,)	
)	
Defendants.)	

**UNOPPOSED JOINT MOTION TO EXTEND TIME OR OTHERWISE
RESPOND TO COMPLAINT UNDER RULE 12**

Defendants Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. (collectively the “Wyndham Franchisor Defendants”), pursuant to LCvR6.3, move for an unopposed extension of time to file motions or a responsive pleading under Rule 12 of the Federal Rules of Civil Procedure, and in support show as follows:

1. Plaintiff Nancy R. (“Plaintiff”) initiated this litigation in an action

captioned *Nancy R., pseudonymously v. Plaza Hotels, LLC, et al.*, bearing cause number CJ-2025-1850 from the District Court of Oklahoma County, State of Oklahoma. Plaintiff brought claims against Defendants related to the Trafficking Victims Protection Reauthorization Act and Oklahoma Human Trafficking laws, *inter alia*.

2. On April 23, 2025, the Wyndham Franchisor Defendants removed the case to the United States District Court for the Western District of Oklahoma pursuant to 28 U.S.C. § 1331. [ECF No. 1.]

3. The Wyndham Franchisor Defendants' removal has triggered Federal Rule of Civil Procedure 81(c), which requires defendants who did not answer before removal to answer or present other defenses or objections within 7 days after the notice of removal is filed, or within 21 days of service of the summons and petition, whichever is later. Fed. R. Civ. P. 81(c). Thus, the responsive pleading date for these Defendants in this Court is currently April 30, 2025.

4. Prior to removal, Plaintiff and the Wyndham Franchisor Defendants agreed to an extension of time to respond to Plaintiff's Petition until May 14, 2025, which was granted by the District Court of Oklahoma County. [See ECF. No. 1-6.] The Wyndham Franchisor Defendants now seek an extension in this Court to reflect that previously agreed-upon deadline.

5. Defendants have not previously requested any extension of time to respond to the Complaint in this case from this Court.

6. Plaintiff has no objection to the granting of this extension.

7. Granting this Motion is in the interests of justice and judicial economy and is otherwise the right and proper thing to do.

8. This Motion is not sought for delay, but so that justice may be done.

WHEREFORE, Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. pray that the Court grant this Motion and extend time for Defendants to file a responsive pleading under Rule 12 or otherwise respond to the Petition until May 14, 2025.

Dated: April 25, 2025

Respectfully submitted,

DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

s/ Kaylee P. Davis-Maddy

Michael S. Linscott, OBA No. 17266
700 Williams Center Tower II
Two West Second Street
Tulsa, Oklahoma 74103-3522
Telephone 918-582-1211
Facsimile 918-591-5360
mlinscott@dsda.com

Kaylee Davis-Maddy, OBA No. 31534
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
Telephone (405) 319-3513
Facsimile (405) 319-3524
kmaddy@dsda.com

*Attorneys for Super 8 Worldwide, Inc., Days
Inns Worldwide, Inc., Ramada Worldwide, Inc.,
and Howard Johnson International, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on April 25, 2025, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system, electronic mail, and/or U.S. Mail, postage prepaid:

Fletcher D. Handley, Jr.
THE HANDLEY LAW CENTER
111 S. Rock Island Ave.,
Post Office Box 310
El Reno, OK 73036
Attorney for Plaintiff

Geoffrey C. Parker
Hilton Parker, LLC
7658 Slate Ridge Blvd.,
Reynoldsburg, OH 43068
Attorney for Plaintiff

Michael C. Kane
THE702FIRM Injury Attorneys
400 South 7th Street, Suite 400
Las Vegas, Nevada 89101
Attorney for Plaintiff

Bart Jay Robey
Eric A. Moen
Abby R. Herren
CHUBBUCK DUNCAN & ROBEY, P.C.
1329 Classen Drive
Oklahoma City, OK 73103
*Attorneys for Defendant OKC Airport
ES, LLC*

David Senger
Hunter Siex
4725 East 91st Street, Suite 100
Tulsa, OK 74137
*Attorneys for Defendant Jaliyan
Hospitality, Inc.*

Shubhra Mashelkar
Weinberg, Wheeler, Hudgins, Gunn &
Dial, LLC
999 Peachtree PI NE #2700
Atlanta, GA 30309
*Attorneys for Defendant ESH Strategies
Franchise, LLC*

Plaza Hotels, LLC
3200 S I-35 Service Road
Oklahoma City, OK 73129

Steve Ketter
5101 S. Choctaw Ave.
El Reno, OK 73036

Kajal Hospitality, LLC
c/o Jaydip Modi
1120 S 10th St.
Clinton, OK 73601

Chand & Saaj Hospitality, Inc.
c/o Hitesh Patel
2200 S. Meridian
Oklahoma City, OK 73108

Raj Krupa Hotel, LLC

Yash Enterprises, Inc.

c/o Dilipkumar B. Patel
2200 W 3rd St.
Elk City, OK 73644

c/o Tushar Natha
400 S. Meridian
Oklahoma City, OK 73108

Noor Hotel, LLC
c/o Abdel Jawabreh
3213 Meadow Lane
Edmond, OK 73103

Ambica, LLC
c/o Prakash Patel
5608 NW 107th St.
Oklahoma City, OK 73162

OM, LLC
c/o Ramesh V. Patel
12001 N I-35 Service Road
Oklahoma City, OK 73131

Indra, LLC
c/o Ramesh Patel
11935 N. I-35 Service Rd.
Oklahoma City, OK 73131

Jonathan Wilfong
Oyo Hotels, Inc.
440 Louisiana Street, Suite 1050
Houston, TX 77002
*Attorney for G6 Hospitality Franchising,
LLC*

Michael A. Wiley
1701 Wildhorse Dr.
Edmond, OK 73003

s/ Kaylee P. Davis-Maddy
Kaylee P. Davis-Maddy